

TELEPHONE ASSOCIATION OF MAINE

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Portland, ME 04101
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Dana E. Twombly, President
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SENT VIA FEDERAL EXPRESS OVERNIGHT MAIL SERVICE

September 26, 1995

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FCC MAIL ROOM

Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

**RE: FCC Docket #95-281/CC #95-115 "Amendment of the Commission's
Rules and Policies to Increase Subscribership and Usage of the
Public Switched Network" -- Notice of Proposed Rulemaking**

Dear Secretary:

The Telephone Association of Maine (TAM) hereby submits an original and 4 copies of the attached comments relative to FCC Notice of Proposed Rulemaking in Docket #95-281 "Amendment of the Commission's Rules and Policies to Increase Subscribership and Usage of the Public Switched Network" for your review.

The Telephone Association of Maine is submitting these comments on behalf of its twenty-three (23) Member Companies (member directory attached). We wish to thank you in advance for the consideration of our comments.

Sincerely,



Dana E. Twombly
President

DET:ch

Attachments

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of

FCC No. 95-281

Amendment of the Commission's)	
Rules and Policies to Increase)	CC Docket No. 95-115
Subscribership and Usage of the)	
Public Switched Network)	

Notice of Proposed Rulemaking

DOCKET FILE COPY ORIGINAL

To: The Commission

COMMENTS

The following comments are filed on behalf of the Telephone Association of Maine (TAM) consisting of twenty-three (23) member companies relative to the above Notice of Proposed Rulemaking as released on July 20, 1995.

1. Long Distance Blocking

The majority of our member companies currently offer long distance blocking to our customers for free or for a reasonable fee. We support this concept and believe it is a reasonable way to keep customers on the network that are having difficulty managing their telephone usage. Because most companies already have long distance blocking available to customers, the additional costs of implementation would be minimal.

The concept of voluntary restriction of long distance calling by minutes of use or dollars on the surface sounds like an excellent idea; however, many of our companies would face substantial problems in implementing this service. In order to implement such a service, all toll processing would need to be done on a "real time" basis which is not currently feasible. Polling of switch data and exchanges of tapes containing billing information would present multiple problems with this concept. This concept could be accomplished through the use of prepaid calling cards or "debit cards"

2. Connection Fees

Currently many member companies do adjust or waive deposit fees if customers agree to accept toll restriction service. This seems to be a reasonable accommodation to encourage additional penetration of telephone subscribers. In addition State regulations require LECs to offer payment arrangements on deposits.

Changes to the Lifeline/Linkup Program which would effect customers who choose toll restriction would be difficult to administer. Currently in Maine, Link-up allows for installation of phone service for a fee not to exceed \$10.00. This does not seem to be a major impediment to low income households obtaining telephone service.

3. Disconnection

The Association believes it is critical to allow LECs the ability to disconnect local service for the failure to pay long distance charges. Currently, this is the only effective mechanism the local exchange carriers have to control accounts receivable activity.

In many instances, if the LEC is not allowed to disconnect local service, customers will change from carrier to carrier in an attempt to keep service and to avoid paying the charges.

4. Lifeline Assistance

Currently in Maine, Lifeline customers receive the \$3.50 subscriber line charge credit as well as \$3.50 matched from the State of Maine. Because many LECs in Maine have a very low basic service rate, this credit nearly provides the customer with free local service.

The Association is currently participating in a State mandated Reach Out Plan to increase Lifeline penetration. Although we believe these efforts are successful, ultimately, the best method of reaching those individuals would be direct contact. However, the State considers the welfare lists to be proprietary.

5. Highly Mobile Customers

The Association agrees with the FCC in its suggested methods for keeping highly mobile customers connected to the network including pre-paid calling cards and voice mail. Both of these services are becoming more widely available to customers.

6. Provision of Service in Rural Areas

One of our member companies currently operates a Basic Exchange Telephone Radio Systems (BETRS). They have found the quality of service to be good (digital). It has allowed them to provide service to the customer for a \$900 one time charge because of the incremental investment necessary. This same customer could have been faced with a \$20,000 to \$30,000 landline construction bill. The service is limited in its application in mountainous areas.

Cellular telephone service has provided many rural customers with service; however, current cellular pricing issues have slowed the delivery of service as a replacement to landline service.

Respectfully submitted,

TELEPHONE ASSOCIATION OF MAINE

By: 
Dana E. Twombly, President

TELEPHONE ASSOCIATION OF MAINE
C/O Standish Telephone Company
P.O. Box 289, Route 25
Standish, Maine 04084-0289
Tel: 207-642-9911

Dated: September 26, 1995

Copy to: (Mailed)

Ernestine Creech
Federal Communications Commission
Accounting & Audits Division
2000 L Street, N.W.
Washington, D.C. 20554

International Transcription Service (ITS)
2100 M Street, N.W., Suite 140
Washington, D.C. 20037

Date: September 26, 1995

TAM DIRECTORS

Bryant Pond Telephone Company
Director: Ray Jamison

China Telephone Company
Director: Peggy Pelham

Cobbosseecontee Telephone & Telegraph Co.
Director: Roger E. Goodwin

Community Service Telephone Company
Director: Normand J. Savard

Hampden Telephone Company
Director: Linda Gamble

Hartland & St. Albans Telephone Company
Director: Carl H. Palmer

The Island Telephone Company
Director: Jeffrey V. Webber

Lincolntonville Telephone Co.
Director: Shirley P. Manning

Maine Telephone Company
Director: Bruce G. Ballantyne

Mid-Maine Telecom
Director: Andrew H. Hinkley

Northland Telephone Company
Director: Audrey Prior

NYNEX

Director: Larry Sullivan

Oxford County Telephone & Telegraph Co.
Director: E. Robert Jamison

Oxford West Telephone & Telegraph Co.
Director: Wilfred R. Leighton

Pine Tree Telephone & Telegraph Co.
Director: Timothy D. Hutchison

Saco River Telegraph & Telephone Co.
Director: Robert C. Carroll

TAM DIRECTORS, Continued

Sidney Telephone Company
Director: James G. Taplin

Somerset Telephone Co.
Director: Robert L. Gilbert

Standish Telephone Company
Director: Dana E. Twombly

Tidewater Telecom
Director: Philip A. Blomquist

Union River Telephone Company
Director: William Silsby, Jr.

Unitel, Inc.
Director: Lawrence Sterrs

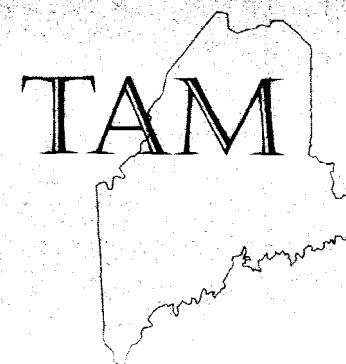
Warren Telephone Company
Director: Duane H. Dunbar

West Penobscot Telephone Co.
Director: Reginald C. Palmer



The Telephone Association of Maine is comprised of 23 independent telephone companies, serving over 118,013 access lines, and NYNEX, serving over 626,661 access lines.

"The purpose of the Association shall be to promote the welfare of its members; to promote the use and development of telephone service and communication services; and to promote uniform and efficient methods of accounting, engineering, construction management and operations among telephone utilities."



TELEPHONE ASSOCIATION OF MAINE, 1995-1996

Dana E. Twombly, *President*
Standish Telephone Company

Lawrence Sterrs, *Vice President*
Unitel, Inc.

Normand J. Savard, *Treasurer*
Community Service Telephone Company

Cathy Harrington, *Secretary*
Standish Telephone Company



Telephone Association of Maine
c/o Standish Telephone Company
P.O. Box 289, Route 25
Standish, Maine 04084-0289
(207) 642-9950

TAM MEMBER COMPANIES

Bryant Pond Telephone Company

P.O. Box 128, Depot
Street, Buckfield,
Maine 04220
Tel: (207) 336-9911
Fax: (207) 336-2970
Access Lines: 570

China Telephone Company

P.O. Box 178, Jones Road
South China, Maine 04358
Tel: (207) 445-0911 Fax: (207) 445-4311
Access Lines: 3,223

Cobbosseecontee Telephone & Telegraph Company

Route 3, Box 2325
Gardiner, Maine 04350
Tel: (207) 724-9911 Fax: (207) 724-9919
Access Lines: 760

Community Service Telephone Company

P.O. Box 400, 33 Main Street
Winthrop, Maine 04364
Tel: (207) 377-9911 Fax: (207) 377-9969
Access Lines: 10,078

Hampden Telephone Company

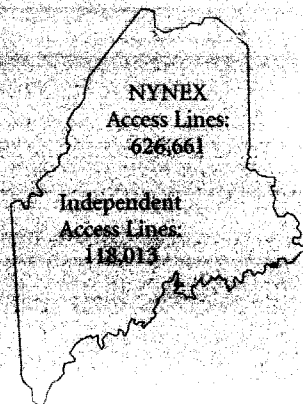
P.O. Box 250, 35 Western Ave.
Hampden, Maine 04444
Tel: (207) 862-9911 Fax: (207) 862-2329
Access Lines: 2,700

Hartland St. Albans Telephone Company

P.O. Box 405, 27 Elm Street
Hartland, Maine 04943
Tel: (207) 938-9911 Fax: (207) 938-9960
Access Lines: 3,311

The Island Telephone Company

P.O. Box 449
Warren, Maine 04864
Tel: (207) 273-9944 Fax: (207) 273-9990
Access Lines: 572



Lincolnville Telephone Company

P.O. Box 199
Lincolnville Center, Maine 04850
Tel: (207) 763-9911 Fax: (207) 763-9902
Access Lines: 1,617

Maine Telephone Company

P.O. Box 689, Route 25
Standish, Maine 04084
Tel: (207) 655-9911 Fax: (207) 642-4333
Access Lines: 9,876

Mid-Maine Telecom

44 Broadway
Bangor, Maine 04401
Tel: (207) 884-9911 Fax: (207) 884-9991
Access Lines: 5,169

Northland Telephone Company

2101 Congress Street
Portland, Maine 04102-1932
Tel: (207) 874-6002 Fax: (207) 874-6012
Access Lines: 19,005

NYNEX

125 High Street, 5th Floor
Boston, Massachusetts 02110
Tel: (617) 743-9376 Fax: (617) 743-8053
Access Lines: 626,661

Oxford County Telephone & Telegraph Company

P.O. Box 128, Depot Street
Buckfield, Maine 04220-0128
Tel: (207) 336-9911 Fax: (207) 336-2970
Access Lines: 4,999

Oxford West Telephone Company

P.O. Box 128, Depot Street
Buckfield, Maine 04220
Tel: (207) 336-9911 Fax: (207) 336-2970
Access Lines: 5,438

Pine Tree Telephone & Telegraph Company

P.O. Box 300
Gray, Maine 04039
Tel: (207) 657-9911 Fax: (207) 657-4775
Access Lines: 5,782

Saco River Telegraph & Telephone Company

P.O. Box 48
Bar Mills, Maine 04004-0048
Tel: (207) 929-9911 Fax: (207) 929-6262
Access Lines: 7,419

Sidney Telephone Company

c/o Utilities, Inc.
P.O. Box 289, Standish, Maine 04084-0289
Tel: (207) 642-9911 Fax: (207) 642-4674
Access Lines: 1,227

Somerset Telephone Company

P.O. Box 129, Elm Street
North Anson, Maine 04958
Tel: (207) 635-9911 Fax: (207) 635-9915
Access Lines: 10,756

Standish Telephone Company

P.O. Box 289, Route 25
Standish, Maine 04084-0289
Tel: (207) 642-9911 Fax: (207) 642-3095
Access Lines: 7,067

Tidewater Telecom

2001 Main Street, Box 1
Damariscotta, Maine 04543
Tel: (207) 563-9911 Fax: (207) 563-9936
Access Lines: 9,117

Union River Telephone Company

P.O. Box 100
Aurora, Maine 04408-0100
Tel: (207) 584-9911 Fax: (207) 584-9997
Access Lines: 1,201

Unitel, Inc.

P.O. Box 165, Main Street
Unity, Maine 04988
Tel: (207) 948-3900 Fax: (207) 948-3021
Access Lines: 4,333

Warren Telephone Company

P.O. Box 273, Union Street
Warren, Maine 04864
Tel: (207) 273-9911 Fax: (207) 273-9990
Access Lines: 1,702

West Penobscot Telephone Company

P.O. Box 0, Spring Street
Corinna, Maine 04928
Tel: (207) 278-9911 Fax: (207) 278-9960
Access Lines: 2,093



*Please note: access line counts are taken as of 7/31/95.